

Exhibit 27

ELEANOR GORSKI

April 11, 2019

Page 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF ILLINOIS
3 EASTERN DIVISION

4 PROTECT OUR PARKS, INC., }

5 CHARLOTTE ADELMAN, MARIA })

6 VALENCIA, and JEREMIAH })

7 JUREVIS, })

8 Plaintiffs, })

9 vs.) No. 18-cv-03424
10 CHICAGO PARK DISTRICT and })

11 CITY OF CHICAGO, })

12 Defendants. })

13 The deposition of ELEANOR GORSKI, called for
14 examination pursuant to Notice and the Rules of
15 Civil Procedure for the United States District
16 Courts pertaining to the taking of depositions,
17 taken before Elizabeth L. Vela, an Illinois
18 Certified Shorthand Reporter, at 311 South Wacker
19 Drive, on April 11, 2019, at the time of 1:09 p.m.
20 (Proceedings concluded at 2:24 p.m.)

21

22

23 Reported by: Elizabeth L. Vela, CSR

24 License No.: 084-003650

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1 APPEARANCES:

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21 MR. ANDREW W. WORSECK,
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1

I N D E X

2 WITNESS

EXAMINATION

3 ELEANOR GORSKI

4 BY MR. ROTH

4

5

6

7

8

E X H I B I T S

9 10 NUMBER

MARKED FOR ID

11 Gorski Deposition

12 Exhibit 1 - (30) (b) (6) Notice

4

13

14 Exhibit 2 - RFP from the University of

15 Illinois at Chicago

4

16

17 Exhibit 3 - RFQ from the University of

18 Illinois at Chicago

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19

20 Exhibit 4 - Response to a Request For

21 Proposal by the University of Chicago

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22

23 Exhibit 5 - Summary Report, The Barack Obama

24 Presidential Library

4

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1 (Whereupon, Gorski Deposition
2 Exhibit 1, Exhibit 2, Exhibit 3,
3 Exhibit 4, and Exhibit 5 were
4 marked for identification.)

5 (Witness sworn.)

6 ELEANOR GORSKI,

7 called as a witness herein, having been first duly
8 sworn, was examined and testified as follows:

9 EXAMINATION

10 BY MR. ROTH:

11 Q. Can you state your name, please?

12 A. Eleanor Esser Gorski.

13 MR. WORSECK: Mark, before you go any further,
14 I just want to put on the record that we are
15 producing today Ms. Gorski in response to certain
16 portions of your amended 30(b)(6) notice.

17 We've set out the details of her
18 designation in prior correspondence and we are
19 producing her subject to various objections we've
20 raised to the notice, as set forth in our March 7th
21 letter, our March 18th letter, our April 4th
22 letter, all of this year, as well as subject to the
23 Court's prior rulings on the scope of discovery.

24

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1 BY MR. ROTH:

2 Q. Okay. These are just some documents I'm
3 going to go through with you, so we'll get to those
4 in a minute, but I just want to get a little bit of
5 your background.

6 So you're with the City of Chicago,
7 correct?

8 A. Yes.

9 Q. What's your position with the City?

10 A. I'm Bureau Chief of Planning, Design, and
11 Sustainability and Historic Preservation with the
12 Department of Planning and Development.

13 Q. Okay. And so can you give me a short
14 synopsis of what that division does?

15 A. Yeah. In all those areas, we have staff
16 that oversee those different policy areas in terms
17 of the city.

18 And we also have some administrative
19 functions. Our -- for example, our historic
20 preservation staff are staff for the commission of
21 Chicago landmarks. We also have a permit review
22 function as it pertains to historic preservation
23 and designated Chicagoland parks.

24 Q. How long have you been employed by the

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1 City?

2 A. Since 1996.

3 Q. And how long have you been in your present
4 position?

5 A. Four years.

6 Q. I'm going to show you what we've marked as
7 your Exhibit No. 1. And if you could just take a
8 look at that.

9 You understand that you've been designated
10 to talk about a couple different topics in this
11 case, right?

12 A. Yes.

13 Q. Okay. So in Exhibit No. 1, there's
14 various topics, starting with 1 through 8, right?

15 A. Correct.

16 Q. And so you've been designated as a witness
17 on Topic No. 1 and on Topic No. 6, correct?

18 A. Yes.

19 Q. So can you just tell us, what did you do
20 to prepare for your deposition?

21 And I'm not asking any conversations you
22 had with your lawyers, but did you review
23 documents? What else did you do?

24 A. Yes, I reviewed the documents that were

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1 supplied by our counsel that would pertain to those
2 topics.

3 Q. Okay. Can you recall what documents more
4 specifically that you reviewed?

5 A. Yes. Mainly, they were documents that
6 pertained to the Plan Commission approvals that the
7 Department of Planning and Development shepherded
8 through.

9 So that would include the applications by
10 the Barack Obama Foundation, the Park District, the
11 Chicago Department of Transportation, the staff
12 reports, the final legislative plan developments,
13 the PowerPoint presentation that was shown to the
14 public, and then, the legislation, the use
15 agreement, master agreement.

16 Q. What would you say the PowerPoint
17 presentation shown to the public -- can you be a
18 little more specific on that?

19 A. Sure. At the Plan Commission hearing on
20 those applications. And I believe that was May of
21 last year.

22 Q. So you're aware that there were various
23 sites in the city of Chicago that were proposed for
24 the Obama Center, right?

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1 MR. WORSECK: Objection. Vague.

2 BY MR. ROTH:

3 Q. You can answer.

4 MR. WORSECK: It states facts not in evidence.

5 THE WITNESS: I am aware.

6 BY MR. ROTH:

7 Q. And there were -- there was a proposal
8 from the University of Chicago, correct?

9 A. Yes.

10 Q. And there was a proposal from UIC, right?

11 A. Yes.

12 Q. And there were a couple other proposals,
13 as well, correct?

14 A. Yes.

15 Q. So I just want to go through some of those
16 proposals with you and have an understanding of
17 some of the details of that, and then, I'm going to
18 ask you some more questions.

19 So what you have in front of you as
20 Exhibit No. 2 is actually an RFP from the
21 University of Illinois at Chicago. Do you see
22 that?

23 A. Yes.

24 Q. And so for ease of reference, what I did

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1 is, I put some yellow tabs on the sides here so we
2 can just go to the --

3 A. Okay.

4 Q. -- sections that we're going to talk
5 about, okay?

6 MR. WORSECK: Mark, just so I'm clear, this is
7 a response from the University of Illinois at
8 Chicago?

9 MR. ROTH: Correct.

10 BY MR. ROTH:

11 Q. Okay. So --

12 MR. WORSECK: And I'm just going to object to
13 this document as not -- as being a document that
14 the City did not produce in response to your
15 discovery requests. And the scope of the
16 deposition topics are expressly limited to
17 documents the City produced.

18 MR. ROTH: Well, let me --

19 MR. WORSECK: So the questioning on this
20 document would go beyond the scope.

21 MR. ROTH: Well, let me actually respond to
22 that, because -- may I see your Exhibit No. 1?

23 The actual -- just so the record is clear,
24 the actual Topic No. 1 talks about documents that

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1 were produced and any known or related information.

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2 So I don't want to get into a -- further
3 belabor the point, but this is certainly subject to
4 Topic No. 1 and documents related to known
5 information about the topics contained in Topic
6 No. 1. So --

7 BY MR. ROTH:

8 Q. All right. So let's -- first of all, I'm
9 going to direct your attention -- about in the
10 middle of the document, there's a Section B. It's
11 the second yellow tab.

12 A. Uh-huh.

13 Q. Do you see that?

14 A. Yes.

15 Q. So if we go to the next page, which is
16 numbered B2 -- do you see that?

17 A. B1.2?

18 Q. Well, I'm looking at page numbers on the
19 bottom.

20 A. Oh, I see. Uh-huh.

21 Q. So there's a Page --

22 A. Yes.

23 0. -- B2 on the bottom --

24 A Yes

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1 Q. -- correct? So this is talking about some
2 of the attributes of two sites that the University
3 of Illinois at Chicago proposed for the
4 Obama Center, correct?

Page 11

5 A. Yeah.

6 MR. WORSECK: Mark, I'm just going to object
7 here, and at the least, counsel the witness to take
8 the time she needs to acquaint herself with the
9 document.

10 As I said, this is not a document that the
11 City produced. So I want to make sure that to the
12 extent you want to persist on asking questions
13 about this document, at the very least, the doc --
14 the witness has a chance to look at the document.

15 MR. ROTH: Sure.

16 BY MR. ROTH:

17 Q. So why don't we do this? Why don't you
18 take a look -- I'm going to be asking you questions
19 about Pages B2 through B6, okay? So just take your
20 time, take a look at those pages, and let me know
21 after you've had a chance to review those. And we
22 can take a break, if you'd like.

23 MR. WORSECK: We can stay on the record while
24 the witness reviews.

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1 THE WITNESS: Is there a table of contents for
2 this document?

3 BY MR. ROTH:

4 Q. Not that I'm aware of.

5 MR. WORSECK: Also, I'm going to object to the
6 foundation of this document. It's not clear to me
7 as I'm sitting here that this, in fact is an RFP
8 response from the University of Illinois at
9 Chicago.

10 I'm not saying it's not. I just don't
11 have a basis for agreeing with you that it is at
12 this point.

13 THE WITNESS: That's why I was asking for the
14 table of contents. I don't see that in the title
15 page -- you know, there's nothing in here that
16 indicates that.

17 It does say it's Round 2. So I'm assuming
18 there was a Round 1. I think A3 has some sort of
19 table of contents of who is involved in this
20 document.

21 MR. WORSECK: While the witness is reviewing
22 the document, I just want to note another
23 objection; and that is, as we construe Topic 1,
24 Topic 1, to the extent it would allow testimony on

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1 alternate sites, it allows testimony on alternate
2 sites only insofar as those sites were actually
3 considered during the 2018 review process by the
4 City. And the UIC proposals were not considered
5 during the 2018 review process by the City.

6 THE WITNESS: So in the table of contents, on
7 A3, it references an A.1 executive summary that may
8 indicate what this document is about. And I don't
9 appear to have an A.1 in my -- A.1 in my package.
10 I don't know if you all have that. I don't seem to
11 have that in mine.

12 MR. WORSECK: Yes, I have an A3. I don't have
13 pages showing a mark for A2 or A1.

14 THE WITNESS: Okay. So I'll just review the
15 pages you asked me to look at.

16 MR. WORSECK: Mark, can you just state again
17 what is it that is beginning at Page B, what do the
18 next few pages you asked the witness to look
19 at deal with?

20 MR. ROTH: 2 through 6.

21 MR. WORSECK: But I mean, what are they dealing
22 with?

23 MR. ROTH: They're dealing with the attributes
24 of one of the sites that was under consideration.

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1 MR. WORSECK: Which site?

2 MR. ROTH: The site proposed by UIC.

3 THE WITNESS: I'm done reviewing, if you are,
4 yeah.

5 BY MR. ROTH:

6 Q. Did you review Pages B2 through B6?

7 A. I did.

8 Q. So I just wanted to go through some of the
9 information contained on those pages, okay?

10 A. Uh-huh.

11 Q. So in Pages B2 through B6 of UIC's RFP,
12 University of Illinois at Chicago was proposing two
13 sites in that RFP, correct?

14 A. Yes.

15 MR. WORSECK: Objection. Lack of foundation.

16 BY MR. ROTH:

17 Q. And if -- as we see on Page B2, under
18 B1.1, one of the sites was owned by the State of
19 Illinois, correct?

20 MR. WORSECK: Same objection.

21 THE WITNESS: Should I still answer?

22 MR. WORSECK: You can answer, if you can.

23 THE WITNESS: Okay. That's what it indicates,
24 yes.

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1 BY MR. ROTH:

2 Q. And the other site is titled the North
3 Lawndale site, right?

4 A. Yes.

5 Q. And that site was owned by the City of
6 Chicago, correct?

7 A. That's what it states.

8 Q. Do you have any information that that is
9 incorrect in any way?

10 MR. WORSECK: Objection. Vague. Lack of
11 foundation.

12 THE WITNESS: I don't have any background
13 information whatsoever on this site. So I can't
14 say if it's correct or incorrect.

15 BY MR. ROTH:

16 Q. And if we go down to B1.3, it says that
17 the University had done a Phase 1 environmental
18 site analysis on that property, correct -- on its
19 property?

20 A. On its own property, correct.

21 Q. And with respect to the North Lawndale
22 property, as of this time of the RFP, the City did
23 not have what's referred to there as an NFR letter.
24 Do you see that?

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1 A. Yes. That's what it indicates.

2 Q. And NFR, I assume means no further
3 remediation?

4 A. I would think so.

5 Q. Did the City ever perform any
6 environmental analysis of the North Lawndale site?

7 MR. WORSECK: Objection. Lack of foundation.

8 And again, all of the questions as to this document
9 are outside the scope.

10 THE WITNESS: I have no knowledge of that.

11 BY MR. ROTH:

12 Q. Did the City ever provide any estimate of
13 costs for any environmental remediation necessary
14 at the North Lawndale site?

15 A. I have no knowledge of that.

16 Q. If we look down a little further on that
17 Page B2, under B1.5, it says circulation and
18 traffic study. Do you see that?

19 A. Yes.

20 Q. Did the City ever perform any analysis of
21 any alterations that would be necessary to the
22 streets or roads as a result of accommodating the
23 Obama Center at the North Lawndale location?

24 A. I'm not aware or have any knowledge of it.

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1 Q. Did the City ever perform any analysis of
2 any road or street alterations that would be
3 necessary to accommodate the Obama Center at the
4 University of Illinois site?

5 A. Again, I'm not aware if that occurred.

6 Q. Did the City perform any analysis of the
7 costs of any potential street or road alterations
8 as a result of locating the Obama Center at either
9 the UIC site or the North Lawndale site?

10 A. That is something that I'm not aware of.

11 Q. Now, if we go to Page B4 -- do you see
12 that?

13 A. Yes.

14 Q. Under the heading parking assessment,
15 there's a subheading for the University of Illinois
16 at Chicago. Do you see that?

17 A. Yes.

18 Q. And this RFP states that there were 5,000
19 parking spaces available at University of Illinois
20 at Chicago, correct?

21 A. That's what it states, yes.

22 Q. And with respect to the North Lawndale
23 site, it describes it as a 23-acre site, correct?

24 A. Yes.

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1 Q. And it says that there is space that
2 exists on that 23-acre site to develop new parking
3 facilities, correct?

4 A. It does say that.

5 Q. Now, if we look at Page B5, the
6 North Lawndale site is described as consisting of
7 approximately 940,000 square feet, correct?

8 A. Yes.

9 Q. And the UIC site is described as having
10 278,000 square feet, right?

11 A. Yes.

12 Q. Let's take a look at Page B6. This
13 document states under the heading conveyance of
14 ownership that the University of Illinois was
15 willing to either enter into a long-term lease for
16 the Obama Center or actually transfer its property
17 to the Obama Foundation, correct?

18 A. Yes.

19 Q. And with respect to the North Lawndale
20 site, the City would be in support of a conveyance
21 of that property that the City owned to the
22 Foundation, correct?

23 A. That's what this states.

24 MR. WORSECK: Objection to the extent the

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1 document speaks for itself and you're just asking
2 the witness to state what's in the document.

3 BY MR. ROTH:

4 Q. Do you have any reason to doubt that the
5 City would not have supported a conveyance of the
6 North Lawndale site to the Foundation?

7 MR. WORSECK: Objection. It calls for
8 speculation.

9 THE WITNESS: I have no knowledge either way.

10 BY MR. ROTH:

11 Q. Did the City have any analysis done to
12 determine the fair market value of the
13 North Lawndale site?

14 A. Again, I have no knowledge of that.

15 Q. Did the City have any analysis done to
16 determine the fair market lease value of the
17 North Lawndale site?

18 A. I don't know. I have no knowledge of it.

19 Q. If we go a little further down the page,
20 we see a Section B.3. Do you see that?

21 A. I do.

22 Q. And under the heading of the
23 North Lawndale site, it indicates that that site
24 was a former industrial site, correct?

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1 A. Yes, it does.

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2 Q. And so the North Lawndale site was not a
3 park, right?

4 A. According to this document, they're saying
5 it was a former industrial site. I don't know what
6 it is now.

7 Q. As of the time of this document, the RFP
8 which is December 2014, was the North Lawndale site
9 a park?

10 A. I can't speak to that. I have no
11 knowledge.

12 Q. So you don't know if it's a park right
13 now, right?

14 A. Correct.

15 Q. And you don't know if it was ever a park?

16 A. That's right.

17 Q. Now, according to this RFP, there was no
18 historic, archeological, or ecological features
19 that are sensitive or would be impacted by
20 construction of the Obama Center, right?

21 A. That's what this states.

22 Q. Do you have any --

23 MR. WORSECK: Mark, can you just direct me to
24 where you're looking at?

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1 THE WITNESS: Right here.

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2 MR. WORSECK: I see.

3 BY MR. ROTH:

4 Q. Do you have any information that the
5 North Lawndale site was a historic landmark site?

6 A. I have no knowledge of that.

7 Q. If we go to Page 3 of Exhibit No. 1 -- so
8 flip all the way forward.

9 A. To the beginning?

10 Q. Yes, please.

11 A. Okay.

12 Q. The University of Illinois sites that they
13 were proposing were consistent with
14 Daniel Burnham's 1909 Plan for Chicago, correct?

15 MR. WORSECK: Objection. The document speaks
16 for itself. You're asking the witness to
17 characterize a document that she has not seen
18 before.

19 THE WITNESS: I'm reading this.

20 BY MR. ROTH:

21 Q. Yes.

22 A. I see Burnham's name here, but I don't
23 know what they're saying.

24 MR. WORSECK: Mark, while the witness is

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1 reviewing the document, can you direct me to
2 where -- under your theory that any known related
3 information is fair game under Topic 1, where in
4 documents produced by the City --

5 MR. ROTH: First of all.

6 MR. WORSECK: -- those documents were
7 addressing information that this --

8 MR. ROTH: Certainly.

9 MR. WORSECK: -- Exhibit 2 purportedly --

10 MR. ROTH: Yeah. So first of all --

11 MR. WORSECK: -- would be relevant to.

12 MR. ROTH: Let me address that while you're
13 reading it.

14 First of all, the topic is not confined to
15 documents produced by the City. It's confined by
16 documents produced in discovery, number one, and
17 any known or related information, number two. So
18 that's what Topic No. 1, which was ordered by the
19 Judge, consists of.

20 The Obama Foundation, as we'll see in this
21 case, produced studies that show each particular
22 site that was listed in the city of Chicago that
23 they considered.

24 These particular sites that we're talking

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1 about are listed in those documents. This is known
2 related information that relates to those documents
3 that the Foundation produced. This is on the
4 Foundation's website. It's one of the sites that
5 was absolutely considered and it's covered by Topic
6 No. 1.

7 MR. WORSECK: So which party produced Exhibit
8 No. 2 in discovery?

9 MR. ROTH: I don't know if any party produced
10 Exhibit No. 2. I know it's been referred to, but
11 I'd have to take a look at where it's at.

12 The Obama Foundation produced documents,
13 which we'll be seeing, that ranked all of the
14 locations in the city. There were several, much
15 more than I'm going to question the witness about
16 here today.

17 And these documents relate to the
18 documents that were produced by the Foundation.
19 And the topic is not related to documents produced
20 by the City. It's related to documents produced in
21 the litigation in discovery, which the
22 Obama Foundation unquestionably did, and any known
23 or related information.

24 MR. WORSECK: So just so I'm clear, you're not

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1 aware of any party having produced Exhibit No. 2 in
2 discovery and your argument for why Exhibit No. 2,
3 nonetheless, is within the scope of Topic 1 is that
4 the Obama Foundation, a third party, produced
5 documents in its discovery that teed up this
6 particular set of issues raised by Exhibit No. 2?

7 MR. ROTH: I think it's -- first of all, it's
8 relevant because it says that -- it talks about
9 documents produced in response to plaintiff's
10 discovery request. The Obama Foundation produced
11 documents in response to plaintiff's discovery
12 request.

13 MR. WORSECK: I understand your reading of the
14 scope. I just want to know what documents you're
15 basing it on. And based on what you said, it
16 sounds like you're basing it on the Obama
17 Foundation's documents.

18 And as we set forth in our objections, we
19 object to testimony to the extent there would be
20 testimony about non-City documents; i.e.,
21 third-party documents.

22 MR. ROTH: Well that's your objection.

23 MR. WORSECK: Right.

24 MR. ROTH: So you've made your objection, and

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1 I'm sure, at some point in time, the Judge will
2 rule on the objection.

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3 MR. WORSECK: Well, you never contested that
4 objection. When you filed your motion for relief
5 in front of the Court, you did not raise --

6 MR. ROTH: I don't have to --

7 MR. WORSECK: -- our construal of the topics as
8 relating only to City-produced documents as a
9 problem that the plaintiffs had any issue with.

10 MR. ROTH: Okay. So what I'd like to do is get
11 along with the deposition.

12 MR. WORSECK: Sure. I just want to make all of
13 this clear on the record.

14 MR. ROTH: Okay. It's all clear.

15 THE WITNESS: Would you mind restating your
16 question?

17 BY MR. ROTH:

18 Q. I will restate my question. According to
19 the RFP, Exhibit No. 1 that you have in front of
20 you, the UIC proposal was consistent with
21 Daniel Burnham's 1909 Plan of Chicago, is that --
22 would that be correct?

23 A. I don't interpret it that way, if I may.
24 The sentence says Daniel Burnham's 1909 Plan of

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1 Chicago offered a westward vision of an integrated
2 city radiating its rational planning model from the
3 proposed Civic Center at Congress and Halsted, in
4 parens, our academic site, to the city's western
5 limit, parens, just beyond our North Lawndale site.
6 That's a pretty broad statement.

7 Q. So is there anything from the City's
8 perspective that was inconsistent with UIC's
9 proposal and Daniel Burnham's 1909 Plan of Chicago?

10 MR. WORSECK: Objection. Outside the scope.
11 Lack of foundation.

12 THE WITNESS: There's a lot in Daniel Burnham's
13 plan. And I would have to review that in careful
14 consideration with this document, which I've not
15 done. So I'm afraid I can't answer that.

16 BY MR. ROTH:

17 Q. Okay. So you don't have an opinion?

18 A. Correct.

19 Q. Let's take a look at the next document,
20 your Exhibit No. 2. I'm sorry. It's Exhibit 3,
21 actually.

22 A. Okay.

23 Q. So I'm going to -- so you have in front of
24 you what is actually an RFQ from the University of

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1 Illinois at Chicago. I'm going to direct your Page 27
2 attention --

3 MR. WORSECK: Mark, I just want to state
4 objections -- I don't want to cut you off once you
5 wind up and get into your question, but I will
6 state the same set of objections as to this
7 document as I was stating as to Exhibit 2.

8 It appears to be a document that was not
9 produced by any party in discovery. If I'm wrong
10 about that, please let me know who produced this.
11 And for the reasons I've stated with respect to
12 Exhibit 2, we view this as outside the scope of the
13 deposition.

14 BY MR. ROTH:

15 Q. I'm going to be asking you questions about
16 Pages 130 through 134. So if you want to just take
17 a moment to read through those, I would appreciate
18 it.

19 A. Just so I'm clear, this is the response to
20 an RFQ, and then, the first -- Exhibit 2 is the
21 second round that gave more detail?

22 Q. Correct.

23 A. This is the same process or --

24 Q. Yes. The RFQ that you have in front of

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1 you, Exhibit 3 --

2 A. Exhibit 3.

3 Q. -- is June of 2014.

4 A. Okay.

5 Q. The RFP that you saw before in Exhibit 2
6 is December of 2014.

7 A. I see. Okay. So this was done first --

8 Q. Correct.

9 A. -- the one I'm looking at? All right. So
10 130, you said, to 134?

11 Q. Correct.

12 MR. WORSECK: I also just want to note for the
13 record that the exhibits being handed to the
14 witness, as well as counsel or on the table have
15 various yellow post-it notes attached to certain
16 pages, apparently to help direct the reader's
17 attention to pertinent pages that counsel wishes to
18 focus on, and I would ask that those post-it notes
19 be retained as part of the official exhibits with
20 the record of the deposition.

21 THE WITNESS: And I'd like a magnifying glass
22 for this page because --

23 BY MR. ROTH:

24 Q. It's tough, I know.

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1 A. There are three pages on one page. So I
2 will try my best --

3 Q. Okay. Thank you.

4 A. -- to review this.

5 Q. I appreciate that.

6 A. Okay. So I've skimmed this.

7 Q. Okay. I'm just going to ask you a couple
8 questions about it.

9 A. Yeah.

10 Q. So if we take a look at Pages 130 through
11 132, that lists actually three sites, correct?

12 A. That's what it indicates, yes.

13 Q. Okay. So you see a community site, a
14 medical site, and an academic site, right?

15 A. Right.

16 Q. Now, I want to focus, first of all, on the
17 community site. So that goes on Page 130 to
18 apparently Page 133.

19 A. Yes.

20 Q. First of all, if we look on Page 133,
21 under community site, it talks about utilities. Do
22 you see that?

23 A. Yes.

24 Q. And this RFQ indicates that the site was

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1 already connected to existing sewer, water,
2 electrical, and gas utilities, right?

3 A. Yes.

4 Q. And under existing zoning, the zoning was
5 M2. Do you see that?

6 A. That's what it indicates, yes.

7 Q. And that's light industry district,
8 correct?

9 A. Yes.

10 Q. Okay. So that would indicate that at
11 least as of the time that this RFQ was put out that
12 the community site was not a park, correct?

13 A. Not necessarily.

14 Q. What is the zoning for a park?

15 A. There has been an effort by the City to
16 rezone parks as we get to them. That should be
17 POS. And there are some cases where the parks have
18 not been rezoned to the new zoning classification
19 and they still retain their old classification.

20 Q. Okay. So let me ask you a very direct
21 question.

22 A. Yes.

23 Q. The community site that's shown here both
24 in the RFQ and the RFP at the University of

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1 Illinois at Chicago, is that a park?

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2 A. This information does not indicate that
3 it's a park.

4 Q. Now, if we take a look at the academic
5 site on Page 134 -- do you see that?

6 A. Yes.

7 Q. That indicates under utilities that storm
8 water, city water, natural gas, and redundant high
9 voltage underground electrical distribution were
10 available at that academic site, right?

11 A. Yes.

12 Q. And do you have any information that the
13 academic site was a park or is a park?

14 A. You know, I'm sorry, I need to amend my
15 last answer.

16 This isn't even like a complete thought
17 under utilities. It just lists utilities. It
18 doesn't even say if they're actually connected to
19 the site.

20 So I want to be precise here. As opposed
21 to the last site, where it actually stated there
22 were connections on -- visible on-site, this does
23 not.

24 Q. Okay. Do you know --

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1 MR. WORSECK: And again, I just want to make
2 clear on the record that, you know, the document,
3 whatever it is, speaks for itself. You're asking
4 the witness to respond to your characterizations of
5 the document on the fly.

6 She can answer the questions, but I'm
7 going to object to the extent that you're asking
8 her to agree with certain characterizations that
9 you're offering as to a document that speaks for
10 itself.

11 MR. HENDRICKS: And which she has not reviewed
12 previously.

13 MR. WORSECK: Right.

14 BY MR. ROTH:

15 Q. Do you know if the academic site at the
16 time of this RFQ had water and natural gas and
17 underground distribution --

18 A. No.

19 Q. -- to the site? You have no knowledge?

20 A. I have no knowledge of this site.

21 Q. Let's take a look at Exhibit No. 4. You
22 have that in front of you, right?

23 A. Yes. Uh-huh.

24 Q. Have you seen this document before?

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1 MR. WORSECK: Mark, can you just give me a Page 33
2 second to catch up?

3 MR. ROTH: Okay.

4 THE WITNESS: I've not seen this document
5 before.

6 BY MR. ROTH:

7 Q. This document is a response to a request
8 for proposal by the University of Chicago. Do you
9 see that on the first page?

10 A. I do.

11 Q. Now --

12 MR. WORSECK: Mark, before you get into your
13 questions on the document, I'm going to reassert
14 the same objections as to the prior two exhibits.

15 It looks like based on the Bates stamp
16 here that this was produced by the Foundation, but
17 it was not produced by the City. And so for that
18 reason, it's outside the scope.

19 BY MR. ROTH:

20 Q. Okay. Let's take a look on Page 13 of
21 that document.

22 Under this response to an RFP, University
23 of Chicago was suggesting three potential sites for
24 the Obama Center, would that be correct?

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1 A. I'm sorry. I'm reading what Page 13 is Page 34
2 stating here.

3 MR. WORSECK: While the witness is looking, I
4 just want to amend the objection I just stated.

5 I believe I said the document was not
6 produced by the City. I meant to say the document
7 was not generated by the City. It's not a City
8 document. It's a University of Chicago document.

9 THE WITNESS: So Page 13 does state that this
10 section outlines three sites that could support an
11 accessible and engaged Presidential Center in the
12 narrative. That was your question, right? Is that
13 what this is showing, yes.

14 BY MR. ROTH:

15 Q. Yes. So the three sites that the
16 University of Chicago was suggesting as candidates
17 for the Obama Center were the South Shore site,
18 what's described as the Woodlawn site, right?

19 A. Yes.

20 Q. And also, the Washington Park site,
21 correct?

22 A. That is what is shown in this map.

23 Q. Okay. And when we see the Woodlawn site,
24 that's actually Jackson Park, isn't it?

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1 A. Yes.

2 Q. Did the City perform any analysis of the
3 benefits and detriments to the City of Chicago
4 regarding locating the Obama Center at the South
5 Shore site?

6 MR. WORSECK: Objection. Vague.

7 THE WITNESS: Are you asking in reference to
8 this document, if there's something in here, or --

9 BY MR. ROTH:

10 Q. No. No. Let me repeat -- let me repeat
11 the question. I'm not referencing this document --

12 A. Okay.

13 Q. -- that you see in front of you. I'm
14 asking you a general question.

15 Did the City perform any analysis of the
16 benefits and detriments to the City of Chicago
17 regarding locating the Obama Center at the South
18 Shore site?

19 MR. WORSECK: And I'm going to object as
20 outside the scope to the extent the question is not
21 rooted in a document produced by the City, nor is
22 it -- nor does it pertain to the 2018 review
23 process engaged in by the City.

24 THE WITNESS: I'm not aware of an analysis if

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1 it occurred.

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2 BY MR. ROTH:

3 Q. Did the City of Chicago have any analysis
4 performed of the benefits and detriments to
5 residents of the state of Illinois regarding
6 locating the Obama Center at the South Shore site?

7 MR. WORSECK: Same objection.

8 THE WITNESS: I am not aware if that analysis
9 occurred.

10 BY MR. ROTH:

11 Q. So one of the sites mentioned in here is
12 the Washington Park site, correct?

13 A. Yes.

14 Q. And by here, again, I'm referring to
15 Exhibit 4, correct?

16 A. And page 13.

17 Q. Yes. So let's take a look a little
18 further into Exhibit No. 4. And I'm looking
19 specifically at what's been marked as Page 16 of
20 that document. And the Bates stamp on that is 595,
21 which is in the lower right-hand corner. Do you
22 see that?

23 A. 594?

24 Q. 595.

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1 MS. RAMADANI: It's the second post-it. It
2 should be, I believe.

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3 THE WITNESS: Oh. Page 16. Sorry.

4 BY MR. ROTH:

5 Q. Yeah. Is there a post-it there?

6 MR. WORSECK: There are actually two Page 16s.

7 THE WITNESS: Yeah, there are two.

8 MR. WORSECK: They have different Bates stamps.

9 BY MR. ROTH:

10 Q. Okay. So let me start over so we have a
11 good frame of reference here.

12 A. Okay.

13 Q. I'm looking at Exhibit 4, the page that is
14 Bates stamped 595. Do you see that?

15 A. Yes. Okay.

16 Q. So the Washington Park site in the upper
17 right-hand corner is described as consisting of
18 34.2 acres, correct?

19 A. That is what the document indicates, yes.

20 Q. And there's a box drawn at the bottom of
21 the page that has the title Washington Park. Do
22 you see that at the bottom right-hand corner?

23 A. Yes.

24 Q. And as the site is described here, the

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1 site consists of a part of Washington Park, itself,
2 correct?

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3 A. That's what's indicated, but there's
4 also -- it appears to be a parcel of land outside
5 the park --

6 Q. Right.

7 A. -- as part of it.

8 Q. Okay. So I want to just clarify that.

9 What's described here with respect to the
10 Washington Park site includes a part of
11 Washington Park, itself, correct?

12 A. That's what's indicated in the map, yes.

13 Q. And then, there's another separate parcel
14 that is outside of the park, right?

15 A. It appears that way, yes.

16 Q. So let's take a look now at what has been
17 Bates stamped University Page 616.

18 And why don't you just take a moment, if
19 you would, please, to read that page to yourself
20 and let me know when you're done.

21 A. Okay.

22 Q. Now, in the first sentence of the second
23 paragraph, the University of Chicago concluded that
24 the Washington Park site pairs the greatest need

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1 with the greatest opportunity. That's what it
2 says, right?

3 A. That's what it's stating, yes.

4 Q. And in the last paragraph of this same
5 page, it states that placing the Obama Center in
6 this site provides an opportunity for the
7 Foundation to develop the Presidential Center
8 without occupying Park District land, correct?

9 A. That's what the last sentence states.

10 Q. Well, let's take a look at the next page,
11 which is University 617.

12 Now, if we take a look at Subsection 4
13 entitled plan for land assembly, including
14 anticipated cost for preparing the site for
15 development -- do you see that?

16 A. Yes.

17 Q. And it indicates that the land that's not
18 part of the Park District land contains a filling
19 station and an auto garage, correct?

20 A. Yes.

21 Q. And University of Chicago anticipated that
22 there would be costs of about \$220,000 to remediate
23 that property, right?

24 A. I'd like a minute to read this.

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1 Q. Oh, I'm sorry.

2 A. Yeah.

3 Q. Of course.

4 MR. WORSECK: Take your time.

5 THE WITNESS: Okay.

6 BY MR. ROTH:

7 Q. So just to back up a little bit --

8 A. Yeah.

9 Q. -- with respect to the Washington Park
10 site, we're talking about the portion of the
11 proposed site that was not Park District land,
12 correct? Do you understand that?

13 A. I do, but I'm seeing if that is really
14 clear here, because you know, I'm relying on what's
15 written here.

16 So the Washington Park site includes both
17 the parcel in the park, as well as the parking --
18 or as well as the parcels on Garfield Boulevard,
19 but they don't distinguish between the two when
20 they talk about environmental remediation. So you
21 have to infer that so --

22 Q. Okay. Well, let me ask you this.

23 A. Yeah.

24 Q. Is there a filling station and auto garage

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1 located on the Wash -- on the property that
2 consists of Washington Park?

3 MR. WORSECK: Objection. Foundation.

4 THE WITNESS: No. And they do state that the
5 filling station and auto garage is on East Garfield
6 Boulevard --

7 BY MR. ROTH:

8 Q. Okay. So --

9 A. -- in this document.

10 Q. Right. So the filling station and auto
11 garage are on the part of the Washington Park site
12 that does not consist of Park District land,
13 correct?

14 A. That's what they're indicating, yes.

15 Q. Okay. And the University of Chicago
16 indicated that their estimate to clean up those --
17 that site that's not part of the park would be
18 about \$220,000, correct?

19 MR. WORSECK: Objection. The document speaks
20 for itself.

21 THE WITNESS: So they do state that to remove
22 the gas tanks and the demolition. They then state
23 in the next paragraph that remediation of the
24 contaminated soil is not part of that estimate is

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1 what I infer from this.

2 BY MR. ROTH:

3 Q. Okay.

4 A. Yeah.

5 Q. And this is not -- obviously, removing the
6 remediated soil and demolishing the filling station
7 and the auto garage is all work that's not
8 happening on the Park District-owned land, correct?

9 A. That's what they're indicating here.

10 Q. Okay. Let's go to the next page. Did
11 this -- let me ask you this.

12 Did the City ever perform any analysis of
13 any changes in the roads or streets that would be
14 necessary to accommodate the Obama Center at the
15 Washington Park location that was suggested by the
16 University of Chicago?

17 MR. WORSECK: Same objections as raised before
18 as outside the scope.

19 THE WITNESS: So I am not aware if any of those
20 studies were done.

21 BY MR. ROTH:

22 Q. Did the City perform any analysis of the
23 costs of any road or street alterations that would
24 need to be accomplished in order to locate the

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1 Obama Center at the Washington Park location that
2 was offered by the University of Chicago?

3 MR. WORSECK: Objection. Outside the scope.

4 THE WITNESS: Could I have a minute and ask you
5 a question?

6 BY MR. ROTH:

7 Q. Well, can you answer my question --

8 A. Oh.

9 Q. -- and then, you can certainly talk to
10 Andrew.

11 A. Okay. Not that I'm aware.

12 MR. ROTH: Do you want to talk?

13 MR. WORSECK: Do you want to take a break?

14 THE WITNESS: Yeah. Do you mind?

15 MR. ROTH: You can go outside, yeah. That's
16 fine. Yeah.

17 (A short break was taken.)

18 BY MR. ROTH:

19 Q. Now, the portion of the land that's not in
20 Washington Park in this proposal by the University
21 of Chicago, that land that's not in the park, to
22 the best of your knowledge, was not a historic
23 landmark property, correct?

24 MR. WORSECK: Objection. Lack of foundation.

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1 It mischaracterizes prior testimony.

2 THE WITNESS: Based on Page 57 and how they
3 describe the sites, they state that they're vacant.
4 So that typically would not indicate there would be
5 any historic landmark --

6 BY MR. ROTH:

7 Q. With --

8 A. -- designation. Oh, I'm sorry.

9 Q. No, go ahead.

10 A. Except this is located on
11 Garfield Boulevard. And the boulevard system has
12 been placed on the national register. So even if
13 they haven't stated it, it is.

14 Q. So is the land that the filling station --
15 I'm sorry.

16 The land that the filling station and the
17 auto garage were located on that's described in
18 this response to the request for proposal, you're
19 saying that that's somehow historic property?

20 A. The entire boulevard and park system for
21 the City of Chicago, of which Garfield Boulevard is
22 a part of, and the parcels on either side are
23 considered part of that system.

24 So yes, it would be included as part of

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1 that national register nomination or district,
2 though that's not stated in the document here.
3 That's my personal knowledge.

4 Q. So the zoning for that parcel, as we see
5 on Page 57 of Exhibit 4, was RS-3 zoning, correct?

6 A. You are looking at 4 on Page 55 or where
7 are you?

8 Q. I'm looking at Page 57 --

9 A. Okay.

10 Q. -- which is Bates stamped University 618.

11 A. Right.

12 Q. Do you see that?

13 A. Uh-huh.

14 Q. And under Roman Numeral X -- do you see
15 that, the bottom right-hand corner?

16 A. Yes. Uh-huh. RS-3.

17 Q. Yes.

18 A. Uh-huh.

19 Q. Okay. So the zoning for the parcel that
20 was not in the park is RS-3?

21 A. Uh-huh. That's what this states, yes.

22 Q. Did the City of Chicago perform any
23 analysis as to the fair market value of the
24 property described in this Washington Park location

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1 that was not on the parkland?

2 MR. WORSECK: Objection. Outside the scope.

3 THE WITNESS: Not that I have knowledge of.

4 BY MR. ROTH:

5 Q. Did the City perform any analysis of the
6 fair market rental value of that property?

7 MR. WORSECK: Same objection.

8 THE WITNESS: Not that I have knowledge of.

9 BY MR. ROTH:

10 Q. Did the City perform any analysis of any
11 alterations to the public transportation system
12 that would be necessary to accommodate the
13 Obama Center at the Washington Park location?

14 MR. WORSECK: Objection. Outside the scope.
15 Vague.

16 THE WITNESS: Not that I'm personally aware of.

17 BY MR. ROTH:

18 Q. Did the City perform any analysis of any
19 costs to the residents of the City of Chicago to
20 alter any public transportation facilities to
21 accommodate the Obama Center at the Washington Park
22 location?

23 MR. WORSECK: Objection. Outside the scope.

24 THE WITNESS: Not that I'm aware of.

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1 BY MR. ROTH:

2 Q. Okay. Let's take a look at the next
3 exhibit, which is Exhibit 5.

4 A. Uh-huh.

5 Q. This is a document entitled Summary
6 Report, The Barack Obama Presidential Library. Do
7 you see that?

8 A. Yes.

9 Q. And if we --

10 MR. WORSECK: Mark, before you get rolling
11 again, I just want to note for the record the same
12 objections I raised before as to documents that
13 were not produced by the City or City-generated
14 documents.

15 BY MR. ROTH:

16 Q. If we take --

17 MR. WORSECK: Those materials are outside the
18 scope of the deposition.

19 BY MR. ROTH:

20 Q. If we take a look at the page that's Bates
21 stamped Obama Foundation 2210 -- can you turn to
22 that, please?

23 A. Yes.

24 Q. So --

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1 MR. WORSECK: Can you give me a second, Mark?

2 2210? Okay.

3 BY MR. ROTH:

4 Q. So this page that you're looking at, and
5 then, the page that follows, 2211, describe
6 14 locations that were under consideration for the
7 Obama Presidential Center. Do you see that?

8 A. Yes.

9 Q. And some of those locations were in the
10 city of Chicago, right?

11 A. Yes.

12 Q. So for example, we see on Bates stamped
13 Page 2210 that there was a proposal by the
14 Bronzeville Investment Alliance. Do you see that?

15 A. Yes.

16 Q. And there was a proposal by Chicago
17 Lakeside Development, right?

18 A. Yes.

19 Q. And then, Chicago State University had
20 Option A and Option B that they proposed, right?

21 A. You know, can -- I'm sorry. If I could
22 ask a question. I have not seen this document
23 before, and I'm, in my mind, trying to understand
24 the chronology.

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1 You're asking if these are suggested
2 sites, but there was an RFQ, and then, a follow-up
3 response to an RFP. In which order did this
4 document -- was this generated, I guess,
5 chronologically?

6 Q. Well, we would have to look at the dates,
7 but this is August of 2014.

8 A. And then --

9 Q. So --

10 A. -- these were done after, is that right?

11 Q. Before and after.

12 A. Okay. So the RFQ was done first, then --

13 MR. WORSECK: Just for the record, the witness
14 was pointing to the stack of previous exhibits when
15 she asked these were done after.

16 THE WITNESS: And I'm just asking to be precise
17 to answer your questions, because you're asking me
18 if these are proposed sites. So I would like to
19 know, are these sites that were done in the first
20 tranche of RFQ responses or RFP?

21 BY MR. ROTH:

22 Q. I don't know that answer.

23 A. Okay. All right. So I'll try to answer
24 as best as I can --

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1 Q. Please do.

2 A. -- even though I'm not -- yeah.

3 Q. So this document that you're looking at,
4 though, which is Exhibit 5 --

5 A. Yes.

6 Q. -- lists at least two options that Chicago
7 State University proposed, correct?

8 A. I'm sorry. I'm a little uneasy saying
9 they proposed it. Can I just read this first
10 page --

11 Q. Of course.

12 A. -- to see what this document is a summary
13 of?

14 Okay. So Page 5, I think, answers the
15 questions I was asking. Do you mind restating the
16 question?

17 Q. The University -- I'm sorry. Chicago
18 State University had -- lists an Option A and an
19 Option B in Exhibit No. 5, correct?

20 A. Uh-huh.

21 Q. You have to say yes or no.

22 A. Yes. Sorry. Yes.

23 Q. And if we take a look at the next page
24 Bates stamped 2211, here, we see proposals by UIC

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1 and also University of Chicago, correct?

2 A. Yes.

3 Q. Now, I want to direct your attention to
4 the next two pages Bates stamped 2212 and 2213. Do
5 you see that?

6 A. Yes.

7 Q. Now, these two pages provide what's
8 entitled a summary of responses, correct?

9 A. Yes.

10 Q. And it lists each site and some attributes
11 about the particular sites --

12 A. Yes.

13 Q. -- would that be fair to say?

14 A. Uh-huh.

15 Q. And then, if we take a look at Page 2213,
16 we see that the University of Illinois at Chicago
17 sites are listed and the University of Chicago
18 sites are listed, correct?

19 A. Yes.

20 Q. In looking at the University of Illinois
21 at Chicago sites, the score that the
22 Obama Foundation gave those sites was 120 out of a
23 possible 150 down at the bottom of the page,
24 correct?

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1 A. The University of Illinois at Chicago,Page 52

2 right?

3 Q. Right.

4 A. Yes. Uh-huh.

5 Q. And the Foundation ranked that third best
6 out of 11 particular sites, correct?

7 A. That's what it indicates, yes.

8 Q. And with respect to the University of
9 Chicago sites, we see that Washington Park is
10 listed there, correct?

11 A. Yes.

12 Q. And that received a score of 122 out of
13 150, right?

14 A. Yes.

15 Q. And that was ranked first by the
16 Foundation, correct?

17 A. Yes.

18 Q. And then, we also see next to that is the
19 Woodlawn site, correct?

20 A. Yes.

21 Q. And --

22 A. I'm sorry. I just want -- this is --
23 these ratings were done by the Foundation. I'm
24 sorry if I'm being too precise here, but I don't

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1 want to -- I don't want to give the wrong answer.

2 Okay. It says Foundation members and our
3 advisors assess each respondent and proposed site.
4 So yes, that would be accurate that the Foundation
5 ranked these. Go ahead. I'm sorry.

6 Q. So the Woodlawn site was listed as second
7 out of 11, correct?

8 A. Yes.

9 Q. Okay. Woodlawn being Jackson Park, right?

10 A. Yes.

11 Q. So in this summary report by the
12 Foundation, the Foundation listed the top three
13 locations for the Obama Center as all being in
14 Chicago, would that be fair to say?

15 A. I'm sorry. What -- what was the last
16 part?

17 (Whereupon, the record was read.)

18 THE WITNESS: Yes. Uh-huh.

19 BY MR. ROTH;

20 Q. So you had Washington Park number one,
21 Jackson Park number two, and the UIC sites as
22 number three in this report, right?

23 A. Yes, though I have a question for you.

24 Each one of these ranks, it looks like it has an

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1 asterisk next to it and I don't see what the
2 asterisk indicates.

3 Do you see that down at the bottom or is
4 that just a graphic thing?

5 Q. I didn't make the document. I have no
6 idea.

7 A. All right. Well, again, I'm just saying
8 that as an aside. I'm not sure if that has further
9 information.

10 Q. Okay. But at least from what you're
11 seeing on Page 2213 --

12 A. Yes.

13 Q. -- the top three sites were unquestionably
14 in Chicago, right?

15 A. Yes.

16 Q. All right. So now, there -- I assume that
17 the Obama Center being located in Chicago provides
18 certain benefits, right?

19 A. To Chicago, yes.

20 Q. Okay. Are there certain categories of
21 benefits that locating the Obama Center in Chicago
22 would provide?

23 A. Are you referencing this document again?

24 Q. No.

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1 A. Okay.

2 Q. We're actually done with the documents.

3 A. Okay.

4 Q. So what are the categories of benefits
5 that the City of Chicago would receive by having
6 the Obama Center in the city?

7 A. In the PD staff report that was done to
8 review the proposal made by the Barack Obama
9 Foundation and looking at that site, the benefits
10 were outlined as transportation improvements, park
11 improvements.

12 Bringing in a world class institution to
13 Chicago would certainly have spill-over economic
14 benefits.

15 Q. Well --

16 A. And increased recreational opportunities,
17 yeah.

18 Q. I guess I tried to think of what the
19 benefits would be of having the Obama Center in the
20 city of Chicago. And this is what I came up with.
21 And you tell me if I'm on the right track or I'm
22 completely off base here.

23 One would be that there would be a benefit
24 to the City because you're building something in

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1 the city and that would allow people to be employed
2 to construct a building, right? That would be a
3 benefit?

4 A. That always is with construction, yes.

5 Q. And a second benefit would be that there
6 would be hopefully increased tourism to the city,
7 right?

8 A. Absolutely, yes.

9 Q. And then, a third benefit would be
10 development of the surrounding area or kind of a
11 community development, right?

12 A. You would hope so, yes.

13 Q. And then, there's an educational
14 component, which would be a benefit of having it in
15 the city; and that is, you could educate people
16 about the president -- the former president and his
17 initiatives and service, right?

18 A. Yes.

19 Q. So the locations that were being
20 considered for the Obama Center, in any of those
21 locations that we talked about, a building or
22 buildings would have been constructed, correct?

23 A. Yes.

24 Q. Did the City perform any analysis of the

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1 economic benefits to the City as a result of having
2 the Obama Center built on any particular location?

3 A. Not that I'm aware of.

4 Q. Did the City perform any analysis of the
5 economic benefits of any increased tourism as a
6 result of having the Obama Center at any one
7 location as opposed to a different location?

8 A. The City did not perform that.

9 Q. Did the City perform any analysis of any
10 community development benefits to the City as a
11 result of building the Obama Center in one location
12 versus other potential locations?

13 A. Not that I'm aware of.

14 Q. Did the City perform any analysis as to
15 any educational benefits to the City of Chicago or
16 its residents as a result of locating the
17 Obama Center in one particular location as opposed
18 to another location?

19 A. No, I'm not aware of any.

20 Q. Did the City, itself, ever perform any
21 study analyzing benefits to the City of the various
22 sites that were proposed for the Obama Center?

23 A. Not that I'm aware of.

24 Q. I'm assuming there are detriments to the

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1 City to have the Obama Center, is that correct?

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2 MR. WORSECK: Objection. Vague.

3 THE WITNESS: In terms of a construction
4 project, there's always issues that need to be
5 mitigated, and with the Obama Center in any of
6 these locations, I do see, you know, possible
7 issues, environmental, utilities, kind of the
8 issues that you went through in the beginning, the
9 traffic. Those are all things that would need to
10 be solved for any site.

11 So I guess you could call those
12 detriments, but hopefully, would be solved through
13 the design process.

14 BY MR. ROTH:

15 Q. Did the City ever perform any study or
16 analysis of the detriments to the city's residents
17 of having the site at one location versus another
18 proposed location?

19 A. Not that I'm aware of.

20 Q. Did the City, itself, ever perform any
21 analysis as to whether it was in the best -- strike
22 that.

23 Did the City ever perform any analysis as
24 to comparing the sites that were up for

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1 consideration and whether each site was the best
2 site from the City of Chicago's perspective?

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3 A. Up for consideration from who -- to whom?

4 Who was considering --

5 Q. Let's just talk about the sites that we
6 talked about today, the University of Illinois at
7 Chicago and University of Chicago.

8 A. So being considered by the Barack Obama
9 Foundation?

10 Q. Correct.

11 A. You're asking if the City was part of that
12 evaluation process?

13 Q. No. I'm asking, did the City, itself,
14 perform any study that from the City's perspective,
15 one location was more beneficial than another
16 location?

17 A. Not that I'm aware of.

18 Q. Did the City perform any analysis that
19 locating the Obama Center on public parkland would
20 provide any greater benefit than locating it on
21 non-parkland?

22 A. No.

23 MR. ROTH: Let me just take a break. I might
24 be done. Just give me five minutes.

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1

(A short break was taken.)

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2 MR. ROTH: I have no further questions.

3 MR. WORSECK: And we have no questions. I just
4 want to state for the record that none of the
5 exhibits used with the witness today were documents
6 generated by the City.

7 Only one of them had been even produced by
8 the City. And even that document, which was --
9 well, a version of Exhibit 4, itself, had been
10 generated by a third party.

11 MR. ROTH: Okay. What do you want to do with
12 signature?

13 MR. WORSECK: We'll reserve.

14 (FURTHER DEPONENT SAITH NOT)

15

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1 STATE OF ILLINOIS)

2) SS:

3 COUNTY OF C O O K)

4 I, Elizabeth L. Vela, an Illinois Certified
5 Shorthand Reporter, do hereby certify that
6 heretofore, to-wit, on the 11th day of April, 2019,
7 personally appeared before me, at 311 South Wacker
8 Drive, Chicago, Illinois, ELEANOR GORSKI, in a
9 cause now pending and undetermined in the United
10 States District Court, wherein PROTECT OUR PARKS,
11 INC., et al. are the Plaintiffs, and CHICAGO PARK
12 DISTRICT, et al. are the Defendants.

13 I further certify that the said witness was
14 first duly sworn to testify the truth, the whole
15 truth and nothing but the truth in the cause
16 aforesaid; that the testimony then given by said
17 witness was reported stenographically by me in the
18 presence of the said witness, and afterwards
19 reduced to typewriting by Computer-Aided
20 Transcription, and the foregoing is a true and
21 correct transcript of the testimony so given by
22 said witness as aforesaid.

23 I further certify that the signature to the
24 foregoing deposition was reserved by counsel for

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1 the respective parties.

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2 I further certify that the taking of this
3 deposition was pursuant to Notice, and that there
4 were present at the deposition the attorneys
5 hereinbefore mentioned.

6 I further certify that I am not counsel for nor
7 in any way related to the parties to this suit, nor
8 am I in any way interested in the outcome thereof.

9 IN TESTIMONY WHEREOF: I have hereunto set my
10 hand this 18th day of April, 2019.

11

12

13

14

15

16

17

18

19

20

Elizabeth L. Vela

21

22 Elizabeth L. Vela

23

24

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1 U.S. Legal Support Job No. 793759

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2 -----
3 DEPOSITION OF ELEANOR GORSKI, 04/11/2019
4 -----
5 CASE NAME: PROTECT OUR PARKS, INC., et al. vs.

6 CHICAGO PARK DISTRICT, et al.
7 -----
8 I, Eleanor Gorski, being first duly
9 sworn, on oath, say that I am the witness in the
10 aforesaid statement, that I have read the
11 foregoing transcript of my deposition taken at the
12 aforesaid time and place and that the foregoing is
13 a true and correct transcript of my testimony so
14 given.

15 _____ Corrections have been submitted

16 _____ No corrections have been submitted
17 _____
18 _____

19 ELEANOR GORSKI

20 SUBSCRIBED AND SWORN TO
21 before me this _____ day
22 of _____ A.D., 201__.
23 _____
24 Notary Public

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1 ERRATA SHEET - U.S. Legal Support Job No. 793759

2 _____

3 PAGE LINE

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21 ---- SHOULD READ: _____

22

23 _____ Date: _____

24 ELEANOR GORSKI

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